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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MCDONALD'S CORPORATION,

Plaintiff,

vs.

CIRCA HOSPITALITY GROUP II LLC D/B/A
THE D LAS VEGAS,

Defendant.

Case No.: 2:23-CV-00384-JCM-EJY

**STIPULATION TO EXTEND CASE
SCHEDULE (FIRST REQUEST)**

Pursuant to Local Rules 26-3 and IA 6-1, Plaintiff McDonald's Corporation Plaintiff McDonald's Corporation ("McDonald's") and Defendant Circa Hospitality Group II LLC d/b/a The D Las Vegas ("The D") hereby stipulate and agree to extend the remaining dates in the existing case schedule by approximately six months. This extension will allow the parties time to discuss potential resolution of this action and, if such discussions are unsuccessful, to complete discovery, including discovery related to the Second Amended Complaint. This is the parties' first stipulation to extend the case schedule and is brought for good cause as set forth below.

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1 1. **Discovery completed.** The parties have served their initial disclosures pursuant to
2 Rule 26(a). The parties have also each issued and responded to initial written discovery.

3 2. **Discovery that remains to be completed.** Pursuant to the parties' Stipulation of
4 No Opposition to Plaintiff's Motion for Leave to File Second Amended Complaint, filed
5 contemporaneously herewith, The D has stipulated to withdraw its Limited Opposition to
6 Plaintiff's Motion for Leave to File Second Amended Complaint, ECF No. 82, and the parties have
7 stipulated to allow McDonald's to file its Second Amended Complaint. McDonald's Second
8 Amended Complaint adds new facts and an additional claim for relief. Accordingly, the parties
9 will need to conduct additional discovery relating to the new allegations contained in McDonald's
10 Second Amended Complaint.

11 3. **Reasons for the extension.** The parties have agreed to engage in an in-person
12 settlement negotiation, which will be attended by duly authorized corporate representatives and
13 counsel for the parties, on March 13, 2024. The parties desire to avoid incurring additional costs
14 and expenses relating to discovery pending the outcome of this settlement negotiation. If such
15 negotiations are unsuccessful, the parties believe that an additional six months will be an
16 appropriate amount of time to complete discovery related to the Second Amended Complaint.

4. **Proposed schedule.** The parties propose that all discovery deadlines be extended by six months. With respect to the three deadlines that have already passed—to amend pleadings/add parties, Rule 26(a)(2) initial expert disclosures, and rebuttal expert disclosures—the parties are limited to the new allegations contained in McDonald’s Second Amended Complaint. Subject to the foregoing, the parties propose that the Court amend the scheduling order in this case as follows:

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
Amend Pleadings/Add Parties	December 28, 2023	June 28, 2024
Fed. R. Civ. P. 26(a)(2) Initial Expert Disclosures	January 24, 2024	July 24, 2024
Rebuttal Expert Disclosures	February 23, 2024	August 23, 2024
Discovery Cutoff	March 27, 2024	September 27, 2024
Dispositive Motions	April 26, 2024	October 25, 2024
Joint Pretrial Order	May 24, 2024	November 22, 2024

DATED this 5th day of March, 2024.

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/s/ Yanxiong Li

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IT IS SO ORDERED.


U.S. MAGISTRATE JUDGE

Dated: March 6, 2024